

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

DEBRA SANTACRUZ,  
*Plaintiff,*

v.

VIA METROPOLITAN TRANSIT,  
*Defendant.*

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CIVIL ACTION NO. 5:21-CV-00719-FB

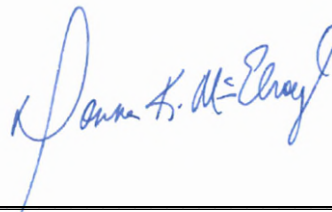
**DECLARATION OF DONNA K. MCELROY**

I, Donna K. McElroy, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. “My name is Donna K. McElroy. I am over 18 years of age and have never been convicted of a felony or of a crime of moral turpitude. I am lead counsel for Defendant in the above-captioned lawsuit. I therefore have personal knowledge to make this Declaration, and the facts contained in it are true and correct.
2. “The document attached to this Declaration as Exhibit A is a true and correct copy of excerpted pages of the deposition transcript of Plaintiff Debra Santacruz, taken on June 15, 2022, and which includes the court reporter’s certificate.

**PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY THAT  
THE FOREGOING IS TRUE AND CORRECT.**

SIGNED this 12th day of August, 2022.



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Donna K. McElroy